

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

ORIGINAL

TY CLEVENGER,

Plaintiff,

vs.

**U.S. DEPARTMENT OF JUSTICE,  
FEDERAL BUREAU OF  
INVESTIGATION, and NATIONAL  
SECURITY AGENCY,**

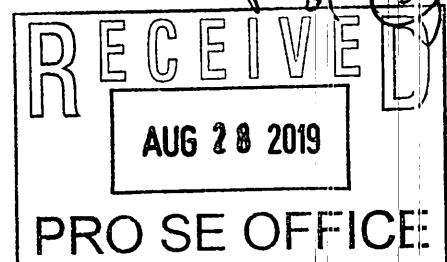
Defendants

Case No. 1:18-cv-1568-LB

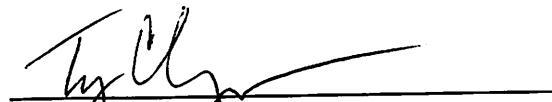
**UNOPPOSED MOTION FOR EXTENSION**

NOW COMES the Plaintiff, Ty Clevenger, moving the Court to grant an extension of time to respond to the Defendants' motion for summary judgment dated July 29, 2019:

On August 8, 2019, two unexpected developments in *Billy Spears v. Steven McCraw, et al.*, Case No. 1:17-cv-1105-RP (W.D. Tex.) forced the Plaintiff to spend a significant part of the last two weeks meeting 14-day response deadlines on behalf of his client, Mr. Spears. The Plaintiff therefore requests a 14-day extension of the deadline for responding to the Defendants' motion for summary judgment. The Plaintiff received the motion on July 31, 2019, the 30-day response deadline is August 30, 2019, and he moves the Court to extend the deadline to September 13, 2019. He further moves the Court to extend the time for the Defendants' reply until September 27, 2019. The Plaintiff conferred with counsel for the Defendants, and they do not oppose this request. The Plaintiff has not previously requested an extension.



Respectfully submitted,

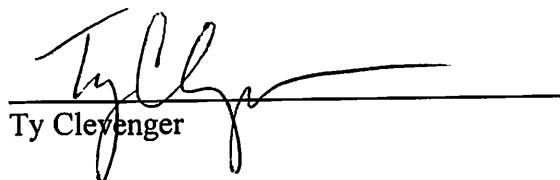


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**CERTIFICATE OF SERVICE**

I certify that on August 28, 2019, I emailed a copy of the foregoing document to Kathleen A. Mahoney, counsel for the Defendants, at [kathleen.mahoney@usdoj.gov](mailto:kathleen.mahoney@usdoj.gov).



Ty Clevenger